

St. Regis Mohawk Tribe, Environment Division
Site Specific Work Plan Proposal
Reynolds Study Site: Administrative Order Index No. II CERCLA-90230
(revised 9/25/09)

Introduction

The Reynolds Metals Company (RMC) located in the Town of Massena, NY entered into a consent order with the New York State Department of Environmental Conservation (NYSDEC) in 1987 for contamination investigation. Subsequent to the consent order additional orders were developed by NYSDEC and the United States Environmental Protection Agency (USEPA) to better characterize hazardous substance contamination at the facility and in the St. Lawrence River in order to develop appropriate clean up remedies. The most recent change was the 1998 Decision Document Amendment that modifies remedies based on cost concerns and changes in clean up goals.

The St. Regis Mohawk Reservation is a Mohawk community located about 1 mile from the RMC facility and the Study Area. Risk Assessment studies have determined that contaminants from the Study Area pose unacceptable risks to several aquatic species in the river. Risk Assessment has also indicated greatest carcinogenic risk to be associated with ingestion of fish by humans and to be unacceptably high. Contamination from the Study Area has been shown to affect Mohawk fish and wildlife resources. Fish and wildlife are important to Mohawks not only for subsistence but also to traditional cultural practices.

The St. Regis Mohawk Tribe (Tribe) is the U.S. federally recognized governmental body of the Akwesasne Mohawks and administers health, welfare, and educational programs to its members. The Tribe is seeking additional support under the CERCLA Site Specific Support Agency Assistance program from the United States Environmental Protection Agency (USEPA), Region 2 that will allow it to participate meaningfully in the remedial activities at the Study Area.

The Tribe submits this proposed work plan and attached budget to USEPA, Region 2 in consideration of funding for the Tribes participation in Site Specific activities at the Study Area. The work plan presents activities it will become involved with to ensure Mohawk concerns are addressed during the remedial project.

This site-specific support agency assistance is necessary to continue Tribal participation and oversight of post-remedial action and maintenance and monitoring activities at the former Reynolds Metal dredging site.

Extensive dredging occurred in the St Lawrence River adjacent to Reynolds Metals during the summer of 2001. Subsequent sampling of the residual sediments showed PCB and PAH contamination above clean up goals of 1 ppm PCBs and 10 ppm PAHs. A temporary cap was constructed in 2001 to contain contaminated sediments in place until

all final remedial activity had been completed. Additional sampling for PAHs in sediment located in the remedial area was conducted from 2002-2006. Based on the results of the field efforts, 76 cells were determined to be above the 10 mg/kg cleanup level for total PAHs. Fifty-three of these cells have total PAHs above 20 mg/kg and were determined according to USEPA's Explanation of Significant Difference (December 2008) to require supplemental remedial activities. A "*Work Plan for the St. Lawrence River Remediation Project*" was developed in fall 2008, revised and approved in May 2009. The Work Plan included details of near shore excavation of a limited number of cells for removal to meet bathymetry requirements, off-shore capping of remaining PAH exceedance cells, and completion of the 2001 PCB interim cap. Remedial Project Completion activities took place between May-September 2009, with minimal activities (i.e. decommission and bank restoration plantings) planned for October 2009.

Construction at the site was completed in October 2009 and long term monitoring and maintenance are the remaining remedial activities for the site. The scope of the monitoring and maintenance will be determined by the monitoring and maintenance plan yet to be developed. The level of oversight is estimated at 15 % of the oversight technician time and 2.5 % administrative oversight time for the next two years. There are uncertainties in these estimates and if oversight needs decrease with decreased monitoring plan needs an appropriate project/budget period extension will be requested.

A SRMT oversight specialist will be funded to assist with reviews of post-remedial action documents, oversight of monitoring, review of monitoring reports, sampling and reporting to the community the progress of the clean up process. Sample analysis and monitoring will be necessary for verification of monitoring plan effectiveness, including but not limited to water, sediment, biota, and/or air media. . Appropriate QA/QC activities will proceed as needed.

The Tribe requests funding to support its activities related to the review of long term monitoring documents, attend and participate in meetings and discussions with RMC and USEPA, oversight of long term monitoring activities and manage administrative responsibilities relating to remedial activities. The funding will partially support the salary of a Tribal staff person who will be responsible for representing the Tribe at meetings, reviewing and commenting on monitoring plan documents and for oversight of long term monitoring activities. All of these tasks will be to ensure that the Tribes interests are met and communicated to RMC, USEPA and NYSDEC.

Approach

The Tribe proposes to participate in the RMC RA and Long-Term Monitoring (LTM) Development process by:

- Reviewing and commenting on RA Completion and LTM Work Plan documents :
- Conducting field visits/inspections

Sampling activities
Post-Completion inspections

- Generating reports concerning the site
 - Progress reports to Environmental Division Director and Tribal Council
 - Reports concerning significant events or issues to USEPA, NYSDEC, RMC, and Tribal Council
 - Periodic public information to Mohawk Community
- Attending meetings with RMC and other Agencies
 - Field meetings at the site
 - Agency meetings with USEPA Region 2, NYSDEC Region 6
 - Tribal Council meetings
 - Public meetings
- Participate in development and implementation of the long term monitoring program.
- Analysis of biota, sediment, water and air for verification and confirmation of achievement of remedial action objectives (RAO) and for split samples in long term monitoring plan

RMC Site Specific January 1, 2010 - December 31, 2011

<i>Description</i>	<i>Remedial Activity</i>
Tribal Technical Oversight (15%)	\$15,570
Tribal Administrative oversight (2.5%)	\$3,888
Fringe	\$ 7,155
Subtotal Personnel	\$26,613
 Contractual – Analytical (lab analysis)	 \$6,000
 Travel	 \$4,448
Supplies	\$4,430
Other	\$3,332
Indirect (11.84% of direct costs)	\$3,281
Grand Total	\$48,104

Contractual

Contract will be for lab analysis split samples over the two year period for post-monitoring activities. The contractor will be selected competitively in compliance with the Tribe's procurement policy and in accordance with 40 CFR Part 35 Subpart O procurement requirements.

TOTAL \$6,000

Office and Field Supplies

Supplies needed to support activities relating to the RMC Site Specific activities for Remedial Action.

Personal protective supplies	2010	2011
Saranex, Tyvek, Barricade suits	\$400	\$400
Workwear – coveralls, jacket, rainsuit	\$225	\$145
Respirator, cartridges	\$275	\$ 145
 Sampling supplies (bottles, lexan tubes, coolers)	 \$500	 \$500
Sediment corer, extension handles,	\$840	
 Office Supplies (Pens, Post-Its, etc.)	 \$500	 \$500
Note pads, copy paper		
 Sub total	 \$2,740	 \$1,690
TOTAL		\$ 4,430

Other

Other directs costs associated with activities relating to the RMC Site Specific activities for Remedial Action, such as office space.

	20010-2011
Phone	\$1006
Postage, Fed Ex	\$1000
Rent	\$1326
TOTAL	\$3,332

Travel

All associated costs relating to traveling to NYC to participate in RMC Site Specific activities for Remedial Action and Long Term Monitoring Development, and local oversight travel and meeting attendance. .

1 person - 4Meetings @ EPA Region II for discussion/meetings on Reynolds Site
\$3,740

(\$120 train, perdiem-\$190, taxi-\$50, mileage-\$275, Hotel-\$250,
parking-\$50 =\$935) X4 = \$3,740

Local Mileage	\$ 708
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TOTAL	\$4,448
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